

GIBSON DUNN

Gibson, Dunn & Crutcher LLP

1050 Connecticut Avenue, N.W.  
Washington, DC 20036-5306  
Tel 202.955.8500  
www.gibsondunn.com

Miguel A. Estrada  
Direct: +1 202.955.8257  
Fax: +1 202.530.9616  
MEstrada@gibsondunn.com

Client: 93701-00001

October 1, 2015

VIA ECF

Hon. John G. Koeltl  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Miss Universe L.P., LLLP et al v. Univision Networks & Studios, Inc. et al  
Case No.: 1:15-cv-05377-JGK

Dear Judge Koeltl:

I serve as counsel to Defendants, Univision Networks & Studios, Inc. and Alberto Ciurana, and write to request that the pre-motion conference that was rescheduled for October 5, 2015 be adjourned to a later date in October.

This is the first request for an adjournment by Defendants, and is necessary only because inclement weather associated with Hurricane Joaquin is expected to affect the New York area on Monday, October 5. I have an oral argument before the Sixth Circuit Court of Appeals in Cincinnati, Ohio on October 6. Given the uncertainty of the weather forecast and the significant risk that it will disrupt travel out of the New York area—thus impeding me from reaching Ohio in time for the argument—I respectfully request that the conference be moved to another date. I will be responsible for presenting Defendants' position at the conference, as the other lead attorney for Defendants, Randy Mastro, is currently at trial before Judge Rakoff and, depending upon the trial schedule, may not be able to attend the conference should it take place on October 5.

Counsel for both sides have conferred in good faith to stipulate to this requested adjournment, and are available on the following alternate dates, subject to the Court's calendar: October 13; the afternoon of October 20; and October 21.

GIBSON DUNN

Hon. John G. Koeltl  
October 1, 2015  
Page 2

Respectfully submitted,

/s/ *Miguel A. Estrada*

Miguel A. Estrada

MAE/vfl

cc: Jeffrey Goldman, Esq. (*via ECF*)  
Patrick McPartland, Esq. (*via ECF*)  
Lawrence S. Rosen, Esq. (*via ECF*)  
Matthew R. Maron, Esq. (*via ECF*)